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CLERK, US DIST. COURT
EASTERN DIST. OF CALIF
AT FRESNO
BY DEPUTY

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9 Attorneys for Defendants
10 NATIONAL RAILROAD PASSENGER CORPORATION,
11 THE BURLINGTON NORTHERN AND SANTA FE RAILWAY COMPANY,
12 WALTER WARD and W.M. DIKE

13 UNITED STATES DISTRICT COURT

14 EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

15 ROCIO ADAME ARAUJO DE AGUILAR, as)
16 heir to BENIGNO ANDES AGUILAR, and)
17 Wife to Deceased BENIGNO ANDRES)
18 AGUILAR, et al.,)

19 Plaintiffs,

20 v.

21 NATIONAL RAILROAD PASSENGER)
22 CORPORATION ("AMTRAK"), a U.S.)
23 statutory corporation, and BURLINGTON)
24 NORTHERN SANTA FE CORPORATION, a)
25 corporation,)

26 Defendants.

27 MARIA RAMIREZ and BENITO VALDIVIA)
28 as Dependents of Jose Mario Munoz; MARIA)
TORRES as Heir and Wife of Jesus Romero-)
Rubio; MARIA D. ALACORN Dependent of)
Deceased Mario Andres Aguilar,)

Plaintiffs,

v.

NATIONAL RAILROAD PASSENGER)
CORPORATION ("Amtrak"); a U.S. statutory)
corporation, BURLINGTON NORTHERN)
SANTA FE RAILWAY CO. a corporation, and)
PALOMA FARM SERVICES, a dba for Rudolf)

No. CIV-F-02-6527 REC LJO

~~PROPOSED~~ STIPULATION AND ORDER
EXTENDING EXPERT WITNESS
DISCLOSURE

C. Paloma and Mark A. Paloma, individuals,
Defendants.

ROSA ROMERO, MATEO ROMERO, EDITH
RODRIGUEZ-HERNANDEZ, ELOY SUAREZ-
RODRIGUEZ, by and through his Guardian Ad
Litem, Jesus Suarez, EZEQUIEL SUAREZ-
RODRIGUEZ, by and through his Guardian Ad
Litem, Jesus Suarez, DIANA SUAREZ-
RODRIGUEZ, by and through her Guardian Ad
Litem, Jesus Suarez,

Plaintiffs,

v.

NATIONAL RAILROAD PASSENGER
CORP., dba "Amtrak"; BURLINGTON
NORTHERN SANTA FE CORP.; SANTA FE
FARM SERVICES, Business Form Unknown;
WALTER WARD; W.M. DIKE, SHAFTER-
WASCO GINNING., CO., POPLAR FARMS,
and Does 1 to 100, inclusive,

Defendants.

ROCIO ADAME ALFARO, individually and as
successor in interest to the estate of Benigo
Aguilar, LIZBETH AGUILAR ADAME, a
minor, by and through her guardian ad litem,
Rocio Adame Alfaro, CLAUDIA MUNOZ,
individually and as successor in interest to the
estate of Mario Munoz, LUIS MARIO MUNOZ,
a minor, by and through his guardian ad litem,
Claudia Munoz, ISAIS SARABIA, individually
and as successor in interest to the estate of
Hector Sarabia, PAOLA DIAZ SARABIA,
individually and as successor in interest to the
estate of Juan Jimenez, JUAN JIMENEZ, a
minor by and through his guardian ad litem Paola
Diaz Sarabia, MARIA GUADALUPE JIMENEZ
DIAZ, a minor by and through her guardian ad
litem Paola Diaz Sarabia, PEDRO JIMENEZ
DIAZ, a minor by and through his guardian ad
litem Paola Diaz Sarabia, ROCIO JIMENEZ
DIAZ, a minor by and through her guardian ad
litem Paola Diaz Sarabia, VALERIA ITZEL

JIMENEZ DIAZ, a minor by and through her
guardian ad litem Paola Diaz Sarabia,

Plaintiffs,

v.

NATIONAL RAILROAD PASSENGER
CORPORATION ("Amtrak"), a U.S. Statutory
Corporation; WALTER WARD; W.M. DIKE;
BURLINGTON NORTHERN SANTA FE
CORPORATION; COUNTY OF KERN;
POPLAR FARMS, INC., SHAFTER-WASCO
GINNING CO., INC., and DOES 1 to 100,
inclusive,

Defendants.

ESTER AGUILAR, individually and as
successor in interest to the estates of Mario
Aguilar and Benigo Aguilar, and Concepcion
Tolentino Marcello, individually,

Plaintiffs,

v.

NATIONAL RAILROAD PASSENGER
CORPORATION ("Amtrak"), a U.S. Statutory
Corporation; WALTER WARD; W.M. DIKE;
BURLINGTON NORTHERN SANTA FE
CORPORATION; COUNTY OF KERN,
POPLAR FARMS, INC., SHAFTER-WASCO
GINNING CO., INC., and DOES 1 to 100,
inclusive,

Defendants.

The parties, through their counsel of record, enter into this stipulation to extend expert
witness disclosure.

A trial is set for November 1, 2005. Expert discovery is to be concluded by July 15, 2005.
Non-expert discovery deadline is June 10, 2005. Mediation is currently set for June 8, 2005.
However, there remains a significant amount of discovery outstanding which is important for the
bases of expert opinion. Therefore, the parties hereby agree to extend expert witness disclosure to
June 13, 2005 and supplemental expert disclosure to June 20, 2005. The parties further agree that
this will in no way affect the trial date.

//

1 DATED: May 5, 2005

LOMBARDI, LOPER & CONANT, LLP

2
3 By: //s// B. Clyde Hutchinson
4 B. Clyde Hutchinson
5 Attorneys for National Railroad Passenger
6 Corporation, Union Pacific Railroad Company, Mr.
7 Ward and Mr. Dike

8
9 DATED: May 5, 2005

LAW OFFICES OF BRIAN A. OSBORNE

10 By: //s// Brian A. Osborne
11 Brian A. Osborne
12 Attorneys Plaintiffs Rosa Romero, et al.

13
14 DATED: May 5, 2005

MINEHAN, MCFAUL & MCLINN, LLP

15 By: //s// Thomas P. Minehan
16 Thomas P. Minehan
17 Attorneys for Defendant Shafter-Wasco Ginning
18 Company, Inc.

19
20 DATED: May 7, 2005

RICHARD FINE & ASSOCIATES

21 By: //s// Richard I. Fine
22 Richard I. Fine
23 Attorneys for Plaintiffs Claudia Munoz, et al.

24
25 DATED: May 5, 2005

GATTUSO, KUMMER & WORTHING

26 By: //s// Dixon G. Kummer
27 Dixon G. Kummer
28 Attorneys for Defendants Paloma Farm Services and
Mark A. Paloma

1 DATED: May 6, 2005

COUNTY COUNSEL, COUNTY OF KERN

2
3 By: //s/ Jennifer L. Thurston
4 Jennifer L. Thurston
5 Attorneys Defendants County of Kern

6 DATED: May 5, 2005

LAW OFFICES OF LUIS A. CARRILLO

7
8 By: //s/ Luis A. Carrillo
9 Luis A. Carrillo
10 Attorneys Plaintiffs Ester Aguilar and Concepcion
11 Tolentino

12 DATED: May 5, 2005

MORENO, BECERRA, GUERRERO & CASILLAS

13
14 By: //s/ Arnoldo Casillas for
15 Gregory W. Moreno
16 Attorneys for Plaintiffs Rocio Adame Alfaro, et al.

17 DATED: May 11, 2005

MCNULTY LAW FIRM

18
19 By: //s/ Daniel S. Glaser for
20 Peter J. McNulty
21 Attorneys for Suarez Family

22 DATED: May 9, 2005

LAW OFFICES OF DAVID LYNN, A.P.C.

23
24 By: //s/ David Lynn
25 David Lynn
26 Attorneys for Plaintiff Maria Ramirez, Maria Torress
27 (for herself and her children), Maria Alarcon (for
28 herself and her children) and Benito Valdivia, [all
pending substitution]

1 Based on the above stipulation the Court hereby orders that the expert witness disclosure
2 is due June 13, 2005.

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4 IT IS SO ORDERED

5 DATED: May 13, 2005

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7 By: 

Judge

8 HONORABLE LAWRENCE J. O'NEILL
9 U.S. MAGISTRATE JUDGE
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